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USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 6/28/12

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June 27, 2012

**BY FACSIMILE -- (212) 805-7986**

Hon. Paul G. Gardephe  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 920  
New York, New York 10007  
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**MEMO ENDORSED****The Application is granted.****SO ORDERED:**

*Paul G. Gardephe*  
Paul G. Gardephe, U.S.D.J.

Dated: June 27, 2012

*The status conference is  
adjourned to  
September 4, 2012  
at 2:45 p.m.*

Re: O'Neill v. Mermaid Touring Inc., et al., 11 Civ.9128 (PGG)(MHD)

Dear Judge Gardephe:

We represent the Defendants, Mermaid Touring Inc. and Stefani Germanotta, in the above-referenced action. We write, pursuant to Your Honor's Individual Practices, to respectfully request (a) that the discovery deadline in this case be extended to September 4, 2012; and (b) that the court conference scheduled for July 2, 2012 be adjourned and rescheduled for September 4 or a later date. Plaintiff's counsel consents to these requests.

The original discovery deadline of July 2, 2012 was extended by the Court to August 2, 2012 in order to accommodate Ms. Germanotta's tour schedule. However, due to Ms. Germanotta's schedule and a trial Plaintiff's counsel has in July, we have been unable to identify deposition dates in July for Ms. Germanotta and the other witnesses. Thus, the parties request an extension of the discovery deadline so depositions can be conducted in August.

Additionally, in light of the change in the discovery deadline to August 2, 2012, and the current request to extend it to September 4, 2012, we request the July 2, 2012 court conference be adjourned until after the close of discovery. All parties are available on September 4, 2012.

Respectfully submitted,

*Steven D. Hurd*  
Steven D. Hurd

cc: Paul Millus, Esq. (by electronic mail)

SDH:dm